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INDUSTRIAL COMMUNICATIONS

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013.

Date filed: 01/28/2014

Name of company covered by this certification:
SAT Radio Communications, LTD. dba Industrial Communications

Address of company covered by this certification:
1019 E. Euclid Ave., San Antonio, TX 78212

FCC Registration Number (FRN): 0001673599

Regulatory Status PMRS Non-Interconnected Carrier

Name of signatory: Hattie Poole
Title of signatory: Partner

I, Hattie Poole, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules. Please see attached accompanying statement.

The company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year (2013).

The company has not received any customer complaints in the past year (2013) concerning the unauthorized release of CPNI. There were no instances of improper access or improper disclosure of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: Hattie C. Poole Date: 1-28-2014

Attachment: Accompanying Statement explaining CPNI procedures

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Accompanying Statement explaining CPNI procedures

SAT Radio Communications, LTD. dba Industrial Communications has established operating procedures that ensure compliance with the FCC regulations regarding protection of customer proprietary network information (CPNI). Industrial Communications has implemented a system whereby the status of a customer's CPNI approval can be clearly determined prior to the use of CPNI. Industrial Communications educates and trains its employees regarding the appropriate use of CPNI. Industrial Communications has established disciplinary procedures should an employee violate the CPNI procedures it has established. Industrial Communications maintains a record that it retains for a minimum period of one year of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Industrial Communications also maintains a record that it retains for a minimum period of one year of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Industrial Communications has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of its compliance for a minimum period of one year. Specifically, Industrial Communications' sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed. Employees of Industrial Communications are prohibited from releasing any customer information to third parties without the customer's written consent to release such information. In addition, if a customer does give Industrial Communications written consent to release particular information to a third party regarding their business or personal operations, the customer's written consent will be given to Industrial Communications' General Manager to keep on file. Failure of an Industrial Communications' employee to follow these company requirements is grounds for disciplinary action, up to and including termination of employment. Industrial Communications' employees are educated and trained annually regarding these requirements. An officer of Industrial Communications, as an agent of Industrial Communications, will sign and file with the Commission a compliance certificate on an annual basis with the Enforcement Bureau before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year. The officer will state in the certification that he or she has personal knowledge that Industrial Communications has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, provide a statement accompanying the certificate that explains how Industrial Communications' operating procedures ensure that it is in compliance with the Commission's CPNI rules, include an explanation of any actions that were taken against data brokers in the past year (if any), and include a summary of all customer complaints received in the past year (if any) concerning the unauthorized release of CPNI. An officer of Industrial Communications will provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly. The notice will be in the form of a letter and shall include Industrial Communications' name, a description of the opt-out mechanism/s used, the problem/s experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission/s has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information. The officer will submit the notice even if Industrial Communications offers other methods by which consumers may opt-out. Failure of the officer to follow these company requirements is grounds for disciplinary action, up to and including termination of employment.

Signed: Hattie C. Poole Date: 1-28-2014